

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE:

Timothy Owen Cochran

Debtor

Case No. 1-24-bk-02355-HWV

Chapter 13

**SECOND MOTION TO FURTHER EXTEND TIME
TO FILE ALL REMAINING DOCUMENTS**

AND NOW, come the above Debtor, by his counsel, Lawrence V. Young, Esquire and CGA Law Firm and files the within Motion averring that:

1. The within Motion is brought pursuant to Bankruptcy Rule 1007 in that it seeks to further extend the time in which the Debtors must file all remaining documents.
2. The above-captioned case is a voluntary Chapter 13 petition, which was filed as an emergency on September 18, 2024.
3. Because of the expedited filing of the within case and the complexities involved in the Debtor's specific circumstances, Counsel for Debtor previously requested an extension of time to prepare and file all requisite schedules, statements and Chapter 13 Plan, which request was granted by this Honorable Court by Order dated October 10, 2024.
4. The Debtor is still gathering documentation which is needed to complete his Chapter 13 Plan, Statements and Schedules.
5. The Debtors and counsel request a short further extension of thirty (30) days to finalize and file all remaining documents.

WHEREFORE, the Debtor request an extension of thirty (30) days in which to file all remaining documents.

Respectfully submitted,
CGA Law Firm

By: /s/ Lawrence V. Young
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**ORDER GRANTING SECOND MOTION TO FURTHER EXTEND TIME TO
FILE ALL REMAINING DOCUMENTS**

AND NOW, upon the consideration of the Motion filed by the Debtor seeking to have the time in which to file all remaining documents further extended, it is hereby ORDERED that the time within which the Debtors must file all remaining documents be extended an additional thirty (30) days, to December 4, 2024.

BY THE COURT,